

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS

SHAUNIECE LEE,

Plaintiff

vs.

RENT RECOVERY SOLUTIONS, LLC

Defendant

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CASE NO.: 4:22-cv-1157

DEFENDANT RENT RECOVERY SOLUTIONS, LLC'S NOTICE OF REMOVAL

TO THE HONORABLE JUDGE:

COMES NOW, Defendant Rent Recovery Solutions, LLC ("Defendant"), and files its Notice of Removal as follows:

1. Plaintiff Shauniece Lee ("Plaintiff") filed their state court complaint on or around November 7, 2022, in the Justice of the Peace Court, Precinct 2, Tarrant County, Texas.
2. This is a civil action based on Plaintiff's contention that Defendant violated the Fair Debt Collection Practices Act, 15 U.S.C. § 1692 *et seq.* (the "FDCPA").
3. Removal is proper because this case involves a federal question—alleged violations of the FDCPA. Therefore, the entire suit is removable under 28 U.S.C. §1441(a).
4. Venue is proper in this district under 28 U.S.C. 1441(a) because the state court where the suit has been pending is located in this district.
5. Removal is timely pursuant to 28 U.S.C. § 1441(b) because Defendant has filed its Notice of Removal within 30 days of service of Plaintiff's state court Petition. Defendant was served on December 1, 2022.

6. Pursuant to U.S.C. § 1441(a), a copy of all process, pleadings, documents, and orders in this case have been attached as **Exhibit A**.

7. A copy of this Notice of Removal has been sent to Plaintiff and will be filed with the Justice of the Peace Court, Precinct 2, Tarrant County, Texas.

8. Plaintiff did not request a jury trial in the state court matter.

WHEREFORE, Defendant respectfully requests that this Court assume full jurisdiction over the proceeding as provided by law.

Respectfully submitted,

MARTIN LYONS WATTS MORGAN PLLC

/s/ Xerxes Martin

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COUNSEL FOR DEFENDANT

CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the foregoing document has been forwarded via **CM/ECF** system to all parties entitled to notice of the same on this 30th day of December 2022.

/s/ Xerxes Martin

EUGENE XERXES MARTIN, IV